

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

CONSOLIDATED INDUSTRIES, LLC
d/b/a WEATHER KING PORTABLE
BUILDINGS,

Plaintiff,

v.

JESSE A. MAUPIN, BARRY D. HARRELL, ADRIAN S. HARROD, LOGAN C. FEAGIN, STEPHANIE L. GILLESPIE, RYAN E. BROWN, DANIEL J. HERSHBERGER, BRIAN L. LASSEN, ALEYNA LASSEN, AND AMERICAN BARN CO., LLC,

Defendants.

Civil Action No. 1:22-cv-01230-STA-jay

District Judge Anderson

Magistrate Judge York

MOTION FOR EXTENSION OF TIME TO MAKE EXPERT DISCLOSURES

Defendants Jesse A. Maupin, Barry D. Harrell, Adrian S. Harrod, Logan C. Feagin, Stephanie L. Gillespie, Ryan E. Brown, Daniel J. Hershberger, and American Barn Co., LLC (the “ABCO Defendants”), by and through their undersigned counsel, respectfully move this Court for a 30-day extension of time, up to and including May 30, 2025, to disclose their Rule 26(a)(2) expert witness information. Counsel have conferred and this motion is unopposed. In support of this motion, the ABCO Defendants state as follows.

1. Under the current scheduling order, the deadline for the ABCO Defendants to disclose their expert witness information pursuant to Federal Rule of Civil Procedure 26(a)(2) is April 30, 2025. (D.E. 150 at 1.)
2. The Court recently granted the parties’ joint motion to extend the deadline for fact

discovery to June 2, 2025. (D.E. 204.)

3. The parties are currently engaged in settlement negotiations. The ABCO Defendants request additional time to make their expert witness disclosures in order to focus their immediate efforts on settlement.

4. On April 25, 2025, counsel for the ABCO Defendants conferred with Plaintiff's counsel regarding this motion and the reasons therefor stated above. Plaintiff's counsel stated that Plaintiff does not oppose the relief requested in this motion.

5. Counsel for the ABCO Defendants has submitted a proposed order regarding this motion to the appropriate ECF mailbox.

For the reasons discussed above, the ABCO Defendants respectfully request that the Court grant their motion and enter an order granting them a 30-day extension of time, up to and including May 30, 2025, to disclose their Rule 26(a)(2) expert witness information.

Date: April 25, 2025

Respectfully submitted,

/s/ Benjamin S. Morrell

Thomas G. Pasternak (admitted pro hac vice)
Benjamin S. Morrell (TBPR No. 35480)
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Counsel for Defendants Maupin, Harrell, Harrod, Feagin, Gillespie, Brown, Hershberger, and American Barn Co., LLC

CERTIFICATE OF CONSULTATION

In accordance with Local Rule 7.2(a)(1)(B), I certify that counsel for the ABCO Defendants conferred with counsel for Plaintiff via email on April 25, 2025, regarding this motion, and Plaintiff's counsel responded that Plaintiff does not oppose the relief requested in this motion.

Date: April 25, 2025

/s/ Benjamin S. Morrell

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I filed the foregoing document with the Clerk of the Court using the Court's CM/ECF filing system, which will send notice of such filing to all counsel of record. I further certify that on the date listed below, I sent the foregoing document to the following individuals at the address listed below via U.S. Mail first-class, postage prepaid, and via email at the email address listed below:

Aleyna Lassen
Brian L. Lassen
1405 N. Fort Grant Road
Willcox, AZ 85643
willcoxbuildings@pm.me

Date: April 25, 2025

/s/ Benjamin S. Morrell